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14
15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA

17 IN RE: VOLKSWAGEN 'CLEAN DIESEL'
18 MARKETING, SALES PRACTICES, AND
PRODUCTS LIABILITY LITIGATION

No. 02672-CRB (JSC)

**DECLARATION OF CELESTE H.G.
BOYD IN SUPPORT OF PLAINTIFFS'
MOTION TO EXCLUDE OPINION OF
DR. PETER ROSSI RELATED TO
PROPER CALCULATION OF
"MARKET PRICE"**

21 This document relates to:

22 *Nemet, et al. v. Volkswagen Group of America,*
23 *Inc., et al.*, Case No. 3:17-cv-04372-CRB

Hearing Date: October 30, 2020
Time: 10:00 a.m.
Courtroom: 6
The Honorable Charles R. Breyer

I, Celeste H.G. Boyd, declare:

1. I am an attorney of record for Plaintiffs Adam Schell, Andrew Olson, Angela Matt Architect Inc., Benjamin Tyler Dunn, Bradley Conner, Brendan Daly, Bryan Sheffield, Catherine Lamenzo, Darryl Lecours, Derek Winebaugh, Eddie Field, Gisbel De La Cruz, Ingrid Salgado, Jennifer Nemet, John Kubala, Ken Galluccio, Mark Miller, Melissa St. Croix, Michael Bowman, Michael Skena, Norbert Kahlert, Stephen Franck, Steven Ferdinand, Steven Rawczak, Sven Hofmann, Thomas Siehl III, and Tonya Dreher. I am over the age of eighteen and competent to testify and provide the following information of my own personal knowledge and information received during the regular course of business.

2. Attached hereto are true and correct copies of the following:

Exhibit No.	Description
1	Expert Report of Peter E. Rossi dated March 13, 2020
2	Excerpts of the Deposition of Peter Rossi, Ph.D. taken July 29, 2020
3	Allenby, G. M. et al. (2014), "Economic Valuation of Product Features," <i>Quantitative Marketing and Economics</i>
4	Allenby, G. M. et al. (2014), "Valuation of Patented Product Features," <i>Journal of Law and Economics</i>
5	Allenby, G., N. Hardt, and P. Rossi (2019), "Economic Foundations of Conjoint Analysis," in <i>Handbook of the Economics of Marketing</i> , Volume 1, J. Dube and P. E. Rossi eds, Amsterdam, Netherlands: Elsevier

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 18th day of September, 2020, in Arlington, Virginia.


Celeste H.G. Boyd

CERTIFICATE OF SERVICE

I hereby certify that on September 18, 2020, I electronically transmitted the foregoing document to the Court Clerk using the ECF System for filing. The Clerk of the Court will transmit a Notice of Electronic Filing to all ECF registrants.

/s/ Steve W. Berman
STEVE W. BERMAN